

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VINCE EVOLA,
[DOB: 05/16/1968]

Defendant.

Case No. _____

COUNT ONE:

18 U.S.C. § 1349

(Conspiracy to Commit Mail Fraud)

NMT: 20 years

NMT: \$250,000

NMT: 3 Years Supervised Release

Class C Felony

\$100 Mandatory Special Assessment

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Commit Mail Fraud)

Scheme and Artifice to Defraud

1. Between on or about January 1, 2006, and continuing thereafter to on or about September 30, 2009, in the Western District of Missouri and elsewhere, Sael Mustafa, Carrie Evola, Kimberly Evola, Rosemary Evola and defendant VINCE EVOLA, and other persons known and unknown, engaged in an unlawful Computer Hacking and Identity Theft scheme designed to obtain stolen credit and debit card numbers in order to make online purchases of goods and services, and in so doing committed multiple federal criminal offenses, including Conspiracy to Commit Mail Fraud, in violation of 18 U.S.C. §§ 1341 and 1349.

2. Beginning in 2006, the defendants developed relationships with several foreign individuals online in an attempt to obtain stolen credit and debit card numbers. One of these individuals was a Jordanian national named Sael Mustafa. Mustafa was a computer hacker. Mustafa was trying to enter the United States, and used his skill in computer hacking to develop a relationship with the defendants. Mustafa also benefited from the defendants possessing physical addresses in the United States, as well as IP addresses from the United States, to authenticate the fraudulent transactions. The defendants used their relationship with Mustafa to further expand their fraud scheme.

3. Mustafa would use a computer hacking technique known as an “SQL Injection” to gain administrator access to several online business websites. Acting with administrator access, Mustafa was able to obtain customer databases of a business, and therefore, download and copy the customers’ personal information. Mustafa effectively exploited businesses for information deemed less important than credit card numbers, such as customers’ usernames, email addresses and passwords, and security questions and answers. Mustafa counted on the fact that customers would often use the same passwords for multiple accounts, and was able to use these unlawfully gained databases of email addresses and passwords at major credit card websites to obtain access to the customers’ credit card account.

4. Mustafa and the defendants would test the unlawfully gained database of customer information in order to see if any email addresses and passwords stolen matched the login and password information for a customer’s credit card account. This worked repeatedly.

5. Once Mustafa and the defendants had access to the credit or debit card accounts, they used it to commit mail fraud. The defendants used these stolen accounts to purchase gift cards or make purchases online from businesses such as Hy-Vee, Nebraska Furniture Mart,

AMC Theaters, Bass Pro Shop, Hallmark, Liz Claiborne, Lowes, Red Lobster, Olive Garden, PF Chang's, and Zales, among others. They directed the products ordered during these transactions to be mailed to Carrie Evola's and VINCE EVOLA's residence at 405 N.W. 65th Street, Gladstone, Missouri, or to the residence shared at the time by Rosemary and Kimberly Evola in Mission, Kansas. Mustafa and the defendants placed these fraudulent orders from computers in Jordan, Mission, Kansas, as well as Gladstone, Missouri, which is in the Western District of Missouri. The gift cards and other products were shipped from the victim businesses, from several locations throughout the United States, to Carrie Evola, VINCE EVOLA, Rosemary Evola, and Kimberly Evola, at their residences in Gladstone, Missouri and Mission, Kansas. Mustafa and the defendants then redeemed these gift cards at businesses in the Kansas City Metropolitan area, or accessed websites and redeemed the gift cards online from computers in Mission, Kansas, or from computers in Gladstone, Missouri.

The Conspiracy and Statutory Charge

6. From at least on or about January 1, 2006, and continuing thereafter to at least on or about September 30, 2009, within the Western District of Missouri and elsewhere, Sael Mustafa, Carrie Evola, Kimberly Evola, Rosemary Evola, and the defendant VINCE EVOLA, together with others both known and unknown, having devised and intending to devise a scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, knowingly and intentionally conspired to deposit and to cause to be deposited packages containing gifts cards to be sent or delivered by the United States Postal Service or private or commercial interstate carrier, and to cause those packages to be delivered by the United States Postal Service or private or commercial interstate carrier according to the directions on the packages, as described in paragraphs one through five above,

for the purpose of executing such scheme and artifice and attempting to do so, all in violation of
18 U.S.C. §§ 1341 and 1349.

A TRUE BILL.

_____/s/ TJ Nigro_____
FOREPERSON OF THE GRAND JURY

_____/s/ Matthew P. Wolesky_____
Matthew P. Wolesky
Assistant United States Attorney

Dated: ____9/25/13_____
Kansas City, Missouri